

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

STANLEY SHAPIRO, *et al.*,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05383 (SMB)

**STIPULATION EXTENDING TIME
TO RESPOND TO SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendants Stanley Shapiro, Renee Shapiro, S&R Investment Co., LAD Trust, Rachel Shapiro, David Shapiro, David Shapiro 1989 Trust, as amended, Trust f/b/o W.P.S. & J.G.S., Leslie Shapiro Citron, Leslie Shapiro 1985 Trust, as amended, Trust f/b/o A.J.C., K.F.C., and L.C.C., as amended, and Kenneth Citron (collectively, "Defendants") may answer, move against, or otherwise respond to the Trustee's complaint ("Complaint") is extended up to and including August 28, 2014. The

Trustee shall respond to Defendants' motion to dismiss by October 23, 2014, and Defendants shall reply to the Trustee's response by November 17, 2014. The hearing in the Bankruptcy Court on Defendants' motion to dismiss shall remain scheduled for December 17, 2014.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: August 22, 2014
New York, New York

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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

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